UNITED STATES BANKRUPTCY COURT
FOR THE
DISTRICT OF MASSACHUSETTS (BOSTON)

In re:
Jennifer Jenks
Richard Jenks
Debtors
_____________________________________/

Chapter 13
Case No.: 16-14704

OBJECTION TO PLAN

Now comes Bank of America, N.A. (together with its predecessors, successors, affiliates, principals, and assigns, “Creditor”) a creditor and party in interest herein, and, by and through its undersigned counsel, hereby objects to the proposed Chapter 13 Plan filed by Jennifer Jenks Richard Jenks ("Debtors"). As grounds, Creditor states as follows:

1. Creditor is a secured creditor of Debtor and is secured by a second mortgage on Debtor’s property located at 12 First Street, Norwood, MA 02062 (the "Property").

2. As of December 13, 2016 Creditor’s total secured claim is $57,430.74 with a pre-petition arrearage of $3,821.54, subject to revision upon filing of Creditor’s proof of claim.

3. On or about February 8, 2017, Debtor filed a proposed Amended Chapter 13 Plan (the "Plan").

4. The Plan provides for the payment of the pre-petition arrearage in the amount of $1,824.00.

5. The Plan does not provide for adequate treatment of Creditor’s secured claim.

WHEREFORE, Creditor respectfully requests that this Honorable Court deny confirmation of Debtors’ proposed Chapter 13 Plan.

Bank of America, N.A.
By its Attorneys,

Dated: March 23, 2017

/s/ Joseph Dolben, Esq._

Joseph Dolben, Esq., #673113
Marinosci Law Group, P.C.
275 West Natick Road, Suite 500
Warwick, RI 02886
Telephone: (401) 234-9200
jdolben@mlg-defaultlaw.com

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CERTIFICATE OF SERVICE

I, Joseph Dolben, Esq., of Marinosci Law Group, P.C., do hereby certify that on March 23, 2017, I served a copy of the Objection to Confirmation of Plan on the attached service list by mailing a copy of same by first class mail, postage prepaid or other method specified on service list.

Signed this 23rd day of March, 2017.

/s/ Joseph Dolben, Esq._
Joseph Dolben, Esq., #673113
Marinosci Law Group, P.C.
275 West Natick Road, Suite 500
Warwick, RI 02886
Telephone: (401) 234-9200
jdolben@mlg-defaultlaw.com

VIA ECF
Ira H. Grolman, Esq., on behalf of Debtor
Carolyn Bankowski-13, Esq., on behalf of Trustee
John Fitzgerald, Esq., on behalf of U.S. Trustee

VIA US MAIL
Jennifer Jenks
Richard Jenks
12 1st Street
Norwood, MA 02062